

1 HERBERT SACHS, ESQ.
Nevada Bar No. 2785
2 602 South Tenth Street
Las Vegas, NV 89101
3 (702) 387-0400
hsachsesq@gmail.com
4 Attorney for Defendants
EVGENII RUSSU and
5 DELYANA NEDYALKOVA

6
7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,)

10 Plaintiff,)

11 vs.)

12 EVGENII RUSSU and)
DELYANA NEDYALKOVA,)

13 Defendants.)
14

Case No. 2:11-cr-00434-LDG-PAL

15 **JOINDER TO DEFENDANTS EVGENII RUSSU AND DELYANA NEDYALKOVA**
16 **MOTION TO CONTINUE TRIAL**

17 Defendants EVGENII RUSSU and DELYANA NEDYALKOVA, by and thru their
18 attorney, HERBERT SACHS, ESQ., hereby joints in Co-Defendant Michael Vale's MOTION
19 TO CONTINUE TRIAL in the above entitled matter.
20

21 DATED this 14th day of December, 2012.
22

23 /s/ Herbert Sachs
24 HERBERT SACHS, ESQ.
Nevada Bar No. 2785
25 602 South Tenth Street
Las Vegas, NV 89101
26 (702) 387-0400
Attorney for Defendants
27 EVGENII RUSSU and
DELYANA NEDYALKOVA
28

SUPPLEMENTAL POINTS AND AUTHORITIES

Defendants EVGENII RUSSU AND DELYANA NEDYALKOVA hereby adopt the points and authorities submitted by Defendant Michael Vales, and submits the following to supplement that argument.

1. A Motion to Withdraw from representation of Defendant EVGENII RUSSU is presently pending before this Court. Keeping the above in mind and until the motion is either granted or denied, the undersigned attorney makes this motion on behalf of both EVGENII RUSSU AND DELYANA NEDYALKOVA.

2. The undersigned is a busy practitioner with many cases pending in both the Nevada State Courts and this Court. Counsel has not completed review of Discovery submitted to him by the United States Attorney Office.

3. Discovery in this case consists of at least 8 CD's. According to Bates Stamps there are over 20,000 pages of Discovery some of which are in a foreign language and must be translated. Based on CA guidelines, if 1 minute per page for discovery review, the amount of discovery in this case would amount to over 330 hours, which translates into over two months of 40 hour weeks.

4. EVGENII RUSSU is presently in custody and resides at the federal prison located in Pahrump, Nevada. DELYANA NEDYALKOVA is presently free on bail and does not object to the continuance and waives any speedy trial requirement.

DATED this 14th day of December, 2012.

ORDER

IT IS SO ORDERED.

DATED this 26 day of December, 2012.

/s/ Herbrt Sachs
HERBERT SACHS, ESQ.
Nevada Bar No. 2785
602 South Tenth Street
Las Vegas, NV 89101
(702) 387-0400
Attorney for Defendants
EVGENII RUSSU and
DELYANA NEDYALKOVA

Lloyd D. George
Sr. U.S. District Judge